ESTTA Tracking number:

ESTTA695634 09/14/2015

Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92061629
Party	Plaintiff StrongVolt, Inc.
Correspondence Address	CHARLES F REIDELBACH JR HIGGS FLETCHER & MACK LLP 401 WEST A STREET, SUITE 2600 SAN DIEGO, CA 92101-7910 UNITED STATES trademarks@higgslaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Charles F. Reidelbach, Jr.
Filer's e-mail	trademarks@higgslaw.com
Signature	/charlesfreidelbachjr/
Date	09/14/2015
Attachments	MOBILEBLACKBOX 9-14-15 Consent Motion to Extend Dates.pdf(92861 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

StrongVolt, Inc..

Opposition No.: 92061629 Regarding Reg. No. 3798681

Petitioner,

V.

Matey Michael Ghomeshi

Registrant.

MOTION TO EXTEND DEADLINES WITH CONSENT

The parties are actively engaged in negotiations for the settlement of this matter.

Petitioner StrongVolt, Inc. hereby requests that this proceeding be suspended for ninety (90) days to allow the parties to continue their settlement efforts, and that all dates be reset accordingly:

Initial Disclosures Due:	12/14/2015
Expert Disclosures Due:	04/13/2016
Discovery Closes:	05/13/2016
Plaintiff's Pretrial Disclosures:	06/26/2016
Plaintiff's 30-day Trial Period Ends:	08/10/2016
Defendant's Pretrial Disclosures:	08/25/2016
Defendant's 30-day Trial Period Ends:	10/09/2016
Plaintiff's Rebuttal Disclosures:	10/24/2016
Plaintiff's 15-day Rebuttal Period Ends:	11/23/2016

The parties conducted the required discovery conference on August 17, 2015. Petitioner secured the express consent of Registrant's counsel on September 11, 2015 for the extension and resetting of dates requested herein.

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Email addresses for Petitioner and Registrant are provided so that any order on this motion may be issued electronically by the Board.

Dated: September 14, 2015 Respectfully submitted,

Charles F. Reidelbach, Jr., Esq. Michael J. Hoisington, Esq. Higgs Fletcher & Mack, LLP 401 West "A" Street, Suite 2600 San Diego, CA 92101-7910

T: 619.236.1551 F: 619.696.1410 Email: <u>trademarks@higgslaw.com</u> ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Extend Deadlines with Consent was served on September 14, 2015 to Jeffrey A. Cohen and Veronica Besmer, attorneys of record for Registrant Matey Michael Ghomeshi, via email to jcohen@cohenblg.com, ybesmer@cohenblg.com (by mutual agreement).

Meilani N. Rivera

Meilani M. R.

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